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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

GREGG SCHUMACHER and **LINDA SCHUMACHER**, individually and as husband and wife, and **GREGG SCHUMACHER FURS LLC, dba SCHUMACHER FURS & OUTERWEAR**,

Plaintiffs,

CV No. 07-CV-00601-MO

DECLARATION OF MEGAN HARTMAN IN SUPPORT OF DEFENDANT PETA's SPECIAL MOTION TO STRIKE

v.

CITY OF PORTLAND, a municipal corporation; **IN DEFENSE OF ANIMALS**, a foreign nonprofit corporation; **ANIMAL LIBERATION FRONT**, an unincorporated association; **PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC.**, a foreign nonprofit corporation; **MATT ROSSELL**; **KEVIN MEIRAS**, aka "Bluejay"; **CONNIE DURKEE**; **ALEX LILLI**; **JOHN DOES 1-10**; and **JANE DOES 1-10**,

Defendants.

I, Megan Hartman, declare and testify as follows:

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1. I make the following statements based on my direct, personal knowledge. If sworn as a witness, I could and would competently testify as set forth herein.

2. I have been employed by People for the Ethical Treatment of Animals, Inc., ("PETA") since September 2000, at its Norfolk, Virginia, headquarters in its International Grassroots Campaign ("IGC") department. PETA's IGC department is responsible for coordinating all of PETA's protest activities in North America.

3. I have read plaintiffs' Complaint and am familiar with the allegations therein.

4. From October 4, 2005, until April 23, 2007, I served as the Campaigns Manager for PETA's IGC department. I now serve as the Assistant Director of the IGC department.

5. As the Campaigns Manager for the IGC department from October 2005 to April 2007, I was responsible for all outreach, operational, and administrative matters for each of PETA's specific grassroots campaigns, including its "skins campaign," which addresses animal cruelty issues involving fur and leather. Matt Rice, who has coordinated PETA's skins campaign since August 2006 is one of the PETA employees who works under my supervision.

6. Because of my supervisory positions within IGC, I have personal knowledge of the administrative procedures the IGC department follows when PETA is involved with organizing or promoting a demonstration.

7. PETA has neither organized nor promoted a single demonstration at or near Schumacher Furs at any time since November 12, 2005, nor earlier in 2005. Had PETA done so, its involvement would have been handled by the IGC department. As a manager for the IGC department, I am certain I would have knowledge of PETA's involvement, if it had occurred.

8. A search was done of the IGC department's business records for evidence that PETA organized or promoted any demonstrations at or near Schumacher Furs since January 1, 2005, or engaged in any of the other conduct alleged in the Complaint. No business records or other evidence to indicate that PETA organized or promoted any demonstration at Schumacher Furs since January 1, 2005, or engaged in any other conduct alleged in the Complaint.

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PETA's SPECIAL MOTION TO STRIKE

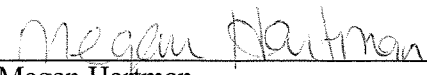
9. Attached to Gregg Schumacher's Declaration in Support of Plaintiffs' Motion for a Preliminary Injunction are 33 photographs and a DVD, both of which show demonstrations that apparently took place at Schumacher Furs. (See Exhibits 2a – 2p). I closely examined plaintiffs' DVD footage and photographs along with Matt Rice. I do not recognize or know the identity of a single person in any of the 33 photographs or DVD footage. None of the persons shown are PETA employees, nor are they acting on behalf of or at the direction of PETA.

10. In their May 25, 2007, response to PETA's Special Motion to Strike, plaintiffs allege that certain individuals engaged in illegal and/or threatening activities during demonstrations at or near Schumacher Furs while in possession of leaflets, stickers, and posters that appear to have been originally published by PETA. (Plaintiffs' Response, pp. 8-9). I was the Campaigns Manager for PETA's IGC department at the time this conduct is alleged to have occurred. I never knew of, participated in, organized, promoted, or encouraged any of the illegal or threatening activities described by plaintiffs. Nor am I aware that any other PETA employee knew of, participated in, organized, promoted, or encouraged any of these activities.

11. Based on my knowledge as a seven-year PETA employee and as a manager of PETA's IGC department for more than two-and-a-half years, neither PETA nor anyone acting on behalf of or at the direction of PETA participated in any demonstrations at or near Schumacher Furs or at or near the Schumachers' private residence, sent any threatening or harassing letters to the Schumachers, contacted prospective landlords from whom the Schumachers were seeking to lease retail space, or interfered with the Schumachers' web site.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed this 8th day of June 2007 at Norfolk, Virginia.



 Megan Hartman

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